

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**MISSISSIPPI ASSOCIATION OF
EDUCATORS, ET AL.**

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:25-cv-00417-HTW-LGI

**BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING, ET AL.**

DEFENDANTS

**JOINDER OF IHL DEFENDANTS IN MOTION TO DISMISS CLAIMS OF
PLAINTIFF UNITED CAMPUS WORKERS SOUTHEAST LOCAL 3821
FOR LACK OF ARTICLE III STANDING**

Defendants Gee Ogletree, in his official capacity as President of the Board of Trustees of State Institutions of Higher Learning, and Steven Cunningham, Amy Arrington, Donald Clark, Jr., Ormella Cummings, Jerry L. Griffith, Jimmy Heidelberg, Teresa Hubbard, Bruce Martin, Hal Parker, Gregg Rader, and Charlie Stephenson, all in their official capacities as Members of the Board of Trustees of State Institutions of Higher Learning (collectively “the IHL Defendants”), by and through counsel, hereby join in the motion of the Non-IHL Defendants and Attorney General [ECF #39] to dismiss all claims asserted in Plaintiffs’ Amended Complaint [ECF #22] by Plaintiff United Campus Workers Southeast Local 3821 (“UCW”) for lack of subject-matter jurisdiction predicated on lack of Article III standing.

In support of their joinder in the aforementioned motion to dismiss all claims asserted by UCW, the IHL Defendants adopt the reasons, arguments, and authorities therefor as set out in Part III of the “Argument” section at pages 21-24 of the memorandum of authorities [ECF #40] filed in support of the motion to dismiss Plaintiffs’ Amended Complaint.

For these reasons, the IHL Defendants respectfully request that the Court make and enter its Order dismissing all claims asserted against them in Plaintiffs' Amended Complaint [ECF #22] by UCW.

THIS the 2nd day of July, 2025.

Respectfully submitted,

GEE OGLETREE, IN HIS OFFICIAL CAPACITY
AS PRESIDENT OF THE BOARD OF
TRUSTEES OF STATE INSTITUTIONS OF
HIGHER LEARNING; AND STEVEN
CUNNINGHAM, AMY ARRINGTON, DONALD
CLARK, JR., ORMELLA CUMMINGS, JERRY L.
GRIFFITH, JIMMY HEIDELBERG, TERESA
HUBBARD, BRUCE MARTIN, HAL PARKER,
GREGG RADER, AND CHARLIE
STEPHENSON, ALL IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE BOARD
OF TRUSTEES OF STATE INSTITUTIONS OF
HIGHER LEARNING, DEFENDANTS

By: LYNN FITCH, ATTORNEY GENERAL
STATE OF MISSISSIPPI

By: s/Rex M. Shannon III
REX M. SHANNON III (MSB #102974)
Special Assistant Attorney General

REX M. SHANNON III (MSB #102974)
LISA A. REPPETO (MSB #99978)
STATE OF MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL
CIVIL LITIGATION DIVISION
Post Office Box 220
Jackson, Mississippi 39205-0220
Tel.: (601) 359-4184
Fax: (601) 359-2003
rex.shannon@ago.ms.gov
lisa.reppeto@ago.ms.gov

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I, Rex M. Shannon III, Special Assistant Attorney General and attorney for the above-named defendants, do hereby certify that I have this date caused to be filed with the Clerk of the Court a true and correct copy of the above and foregoing via the Court's ECF filing system, which sent notification of such filing to all counsel of record.

THIS the 2nd day of July, 2025.

s/Rex M. Shannon III
REX M. SHANNON III